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April 19, 2006

AUSA Thomas J. O'Connor, Jr.
U.S. Attorney's Office
Federal Building and Courthouse
1550 Main Street, Rm 310
Springfield, MA 01103

Re: United States of America v. Naomi Watford
Criminal No. 05-CR-30057-MAP
(Discovery letter, non-motion)

Promises, etc. (CORRECTED LETTER)

Dear Attorney O'Connor:

This is to confirm our phone conference today that the government anticipates filing a response to my discovery letter concerning promises, rewards and inducements on or before Friday, April 21.

Regarding the merits of my discovery request, if you are not already familiar with these cases, you may be interested in reviewing 1) an old opinion of Judge Ponsor's (from when he was the Magistrate), U.S. v. Buendo, an unpublished opinion found at 1998WL 412253 and 2) a more recent decision by Judge Gertner, U.S. v. Snell, 899 F.Supp. 17 (D. Mass. 1995).

Thank you.

Sincerely,

s/ *Myles Jacobson*

Myles Jacobson

cc: Clerk of Court